

# LAW OFFICES OF BOBBI C. STERNHEIM

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August 27, 2020

Honorable Alison J. Nathan  
United States District Judge  
United States District Court  
40 Centre Street  
New York, NY 10007

Re: United States v. Minh Quang Pham  
12 Cr. 423 (AJN)

Dear Judge Nathan:

I write to request a two-week enlargement of time to file defendant's response to the government's letter-motion, dated August 14, 2020, and for permission to file this request out of time. Additional time is needed to confer with Mr. Pham and his UK counsel in connection with drafting his response. Arranging legal calls with Mr. Pham, who is incarcerated at FCI Florence ADMAX under secure administrative measures, is a challenge, and mail delivery both to and from Mr. Pham has been slow.

Under the present schedule, Mr. Pham's response is due on August 28<sup>th</sup>.

I am requesting the following revision to the present schedule:

Defendant's response due by September 11<sup>th</sup>.

Government reply due by September 18<sup>th</sup>.

No prior request has been made.

The government consents to this request.

Your consideration is greatly appreciated.

Very truly yours,

*Bobbi C. Sternheim*

BOBBI C. STERNHEIM

cc: AUSA Anna Skotko  
AUSA David Denton